

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
COURT FILE NO: CV-

MICHAEL LAMIAUX	)	
Plaintiff	)	
v.	)	CASE NO.: 11-5908
WORLDWIDE RECOVERIES, LLC	)	
Defendant	)	

**REQUEST FOR ENTRY OF DEFAULT PURSUANT  
TO FEDERAL RULE OF CIVIL PROCEDURE 55(a)**

***TO THE CLERK OF COURT:***

(1) This matter was commenced against Defendant Worldwide Recoveries, LLC by the filing of a Complaint on September 19, 2011.

(2) On September 29, 2011, Defendant Worldwide Recoveries, LLC was served with the Summons and Complaint pursuant to the applicable Rules of Civil Procedure.

(3) More than twenty-one (21) days has elapsed since the service of the Summons and Complaint on said Defendant and no request for an extension of time to plead to the Complaint has been requested.

(4) Plaintiff requests default be entered against said Defendant.

(5) Attached hereto and marked as Exhibit "A" is Proof of Service of the Summons and the Complaint on the Defendant, the originals of which were filed of record with the Court.

Respectfully submitted,

DATE: December 21, 2011

Mpf8441/s/*Michael P. Forbes*

---

Law Office of Michael P. Forbes, P.C.

By: Michael P. Forbes, Esquire

Attorney for Plaintiff

Attorney I.D.#55767

200 Eagle Road

Suite 220

Wayne, PA 19087

(610) 293-9399

(610)293-9388 (Fax)

[michael@mforbeslaw.com](mailto:michael@mforbeslaw.com)

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
COURT FILE NO: CV-

MICHAEL LAMIAUX	)	
Plaintiff	)	
v.	)	CASE NO.: 11-5908
WORLDWIDE RECOVERIES, LLC	)	
Defendant	)	

**AFFIDAVIT**

I, MICHAEL P. FORBES, ESQUIRE, hereby state the following:

1. I am the attorney of record for the Plaintiff herein.
2. On September 19, 2011, Plaintiff filed the Complaint with the Court.
3. On September 29, 2011, Defendant Worldwide Recoveries, LLC was served with the Summons and Complaint.
5. On October 4, 2011, Proof of Service on Defendant was filed.
6. More than twenty-one (21) days has lapsed since the service of the Summons and Complaint on the Defendants and no request for an extension of time to plead to the Complaint has been requested by the Defendant herein.

DATE: December 21, 2011

Mpf8441/s/ Michael P. Forbes

---

MICHAEL P. FORBES, ESQUIRE

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
COURT FILE NO: CV-

**MICHAEL LAMIAUX** )  
**Plaintiff** )  
**v.** ) **CASE NO.: 11-5908**  
**WORLDWIDE RECOVERIES, LLC** )  
**Defendant** )

## ENTRY OF DEFAULT

AND NOW, this       day of                          , 2011, upon application of  
the Plaintiff, it is hereby ORDERED that a default is entered against Defendant  
Worldwide Recoveries, LLC and in favor of the Plaintiff, Michael Lamiaux, in  
accordance with Rule 55(a) of the Federal Rules of Civil Procedure.

---

J

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
COURT FILE NO: CV-

MICHAEL LAMIAUX	)	
Plaintiff	)	
v.	)	CASE NO.: 11-5908
WORLDWIDE RECOVERIES, LLC	)	
Defendant	)	

**CERTIFICATE OF SERVICE**

I, MICHAEL P. FORBES, ESQUIRE, do hereby certify that I did mail a copy of  
the foregoing, via first class mail, to the following:

Worldwide Recoveries, LLC  
2414 Fairview Street  
Suite 210  
Santa Ana, CA 92704

DATE: December 21, 2011

Mpf8441/s/Michael P. Forbes  
MICHAEL P. FORBES